

# Submission by Transpower New Zealand Ltd on Plan Change 17 to the Central Otago District Plan

August 2021

*Keeping the energy flowing*



**SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED  
ON PROPOSED PLAN CHANGE 17 TO THE CENTRAL OTAGO DISTRICT PLAN**

**To:**

Plan Change 17 Submissions  
Central Otago District Council  
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By email: [resource.consent@codc.govt.nz](mailto:resource.consent@codc.govt.nz)

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Transpower New Zealand Ltd

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**The specific provisions of the proposed plan change that the submission relates to are:**

Refer attached which outlines the specific provisions, sought amendments, reasons and amendments sought.



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Signature of submitter  
[or person authorised to sign on behalf of the submitter.]

**Date: 5 August 2021**

## **SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED ON PROPOSED PLAN CHANGE 17 TO THE OPERATIVE CENTRAL OTAGO DISTRICT PLAN**

### ***Overview***

This is a submission made by Transpower New Zealand Limited ("**Transpower**") on Proposed Plan Change 17 ("**PC17**") to the operative Central Otago District Plan 2008.

This submission seeks to ensure PC17 appropriately recognises and provides for the National Grid. Specifically, from Transpower's perspective, the provisions of PC17 need to ensure that it:

- Gives effect to the National Policy Statement on Electricity Transmission 2008 ("**NPSET**" or "**NPS**");
- Recognises the need to sustainably manage the National Grid as a physical resource of national significance;
- Recognises the benefits of the National Grid at local, regional and national levels; and
- Provides for the effective operation, maintenance, upgrading and development of the National Grid.

In general, PC17 is supported by Transpower; particularly, the proposed changes to correct mapping errors in relation to the "High Voltage Transmission Lines" ("**HVTL**") shown in the operative District Plan. The District Plan is required to appropriately recognise and provide for the National Grid consistent with the National Policy Statement on Electricity Transmission (NPSET) which, amongst other matters, requires district plans to identify transmission lines on planning maps.

It is understood that the proposed map changes are to correct errors that have occurred in the process of converting the district plan from hard copy to online (GIS) format. It is understood that the corrections proposed to the HVTL shown on the plan maps forming part of PC17 do not alter the physical location of the existing transmission lines.

Transpower supports the proposed map changes which provide for more accurate mapping of the HVTL, and more effective implementation of the corresponding HVTL provisions within the District Plan itself. These mapping amendments will ensure that the District Plan is in accordance with the NPSET. It is noted the mapping corrections do not alter the National Grid provisions within the District Plan, rather are a minor correction in terms of accurately depicting the location and extent of the HVTL on the District Plan planning maps.

### ***Introduction to Transpower***

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, the high voltage electricity transmission network for the country. The National Grid links generators directly to distribution companies and major industrial users, feeding electricity to the local networks that distribute electricity to homes and businesses. The National Grid comprises towers, poles, lines, cables, substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 12,000 km of transmission lines and around 170 substations, supported by a telecommunications network of some 300 telecommunication sites, which help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

Transpower's Statement of Corporate Intent for July 2020 to July 2023, states that:

*Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:*

*- As grid owner, to reliably and efficiently transport electricity from generators to distributors and large users, and*

*- As system operator, to operate a competitive electricity market and deliver a secure power system.*

In line with these objectives, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to seek security of supply, thereby contributing to New Zealand's economic and social aspirations. It has to be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient district plan where it may affect the National Grid, including possible future changes.

### **Central Otago District Transmission Assets**

Transpower has a number of overhead and underground transmission line, substation and telecommunications assets within the Central Otago District, comprising the following:

- Cromwell – Frankton A 110kV transmission line (CML-FKN-A)
- Gore – Roxburgh A 110kV transmission line (GOR-ROX-A)
- Halfway Bush – Roxburgh A 110kV transmission line (HWB-ROX-A)
- Roxburgh – Islington A 220kV transmission line (ROX-ISL-A)
- Roxburgh – Three Mile Hill A transmission line (ROX-TMH-A)
- Invercargill – Roxburgh A 220kV transmission line (INV-ROX-A)
- Invercargill – Roxburgh B 220kV transmission line (INV-ROX-B)
- Roxburgh – Twizel A 220kV transmission line (ROX-TWZ-A).

The above lines have a mixture of towers and pi-poles support structures.

There are also four substations in the district, namely: Cromwell, Clyde, Naseby and Roxburgh.

A map of the assets is attached as Appendix A.

### **Specific Comments**

Transpower is broadly supportive of PC17. In particular, Transpower supports the proposed changes to correct mapping errors in relation to the HVTL. The District Plan is required to appropriately recognise and provide for the National Grid consistent with the National Policy Statement on Electricity Transmission (NPSET) which, amongst other matters, requires district plans to identify transmission lines on planning maps.

Specific comments are included in the table below and for the avoidance of doubt, include any consequential relief to the specific relief sought.

| Specific Plan Provision                                          | Support/<br>Oppose/<br>Amendment | Reasons for Submission                                                                                                                                                                                                                                                                                                                                                          | Relief Sought                                                                                                                                                          |
|------------------------------------------------------------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Appendix 17 - Planning Maps</b>                               |                                  |                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                        |
| <b>Plan Maps:</b><br><br><b>16, 33, 37A, 42, 44, 62, 63, 64.</b> | Support                          | Transpower supports the proposed changes to correct mapping errors in relation to the HVTL. The District Plan is required to appropriately recognise and provide for the National Grid consistent with the National Policy Statement on Electricity Transmission (NPSET) which, amongst other matters, requires district plans to identify transmission lines on planning maps. | Retain the planning maps within Appendix 3.1 of Proposed Plan Change 17 (16, 33, 37a, 42, 44, 62, 63 and 64), as notified which show the amended location of the HVTL. |

***Appendix 1: Map of Transpower Assets in the Central Otago District***



# Transpower Assets

## Central Otago District

### Legend

Territorial Land Authority

Boundary

NZ Roads

Highways

### Transpower Assets

Cable Protection Zone

Overhead Fibre Cable

Underground Fibre Cables

Site

ACSTN

COMMS

HVDC

TEE

Transmission Line

0kV Overhead

11, 66kV Underground

11, 33, 66 kV Overhead

110kV Underground

110 kV Overhead

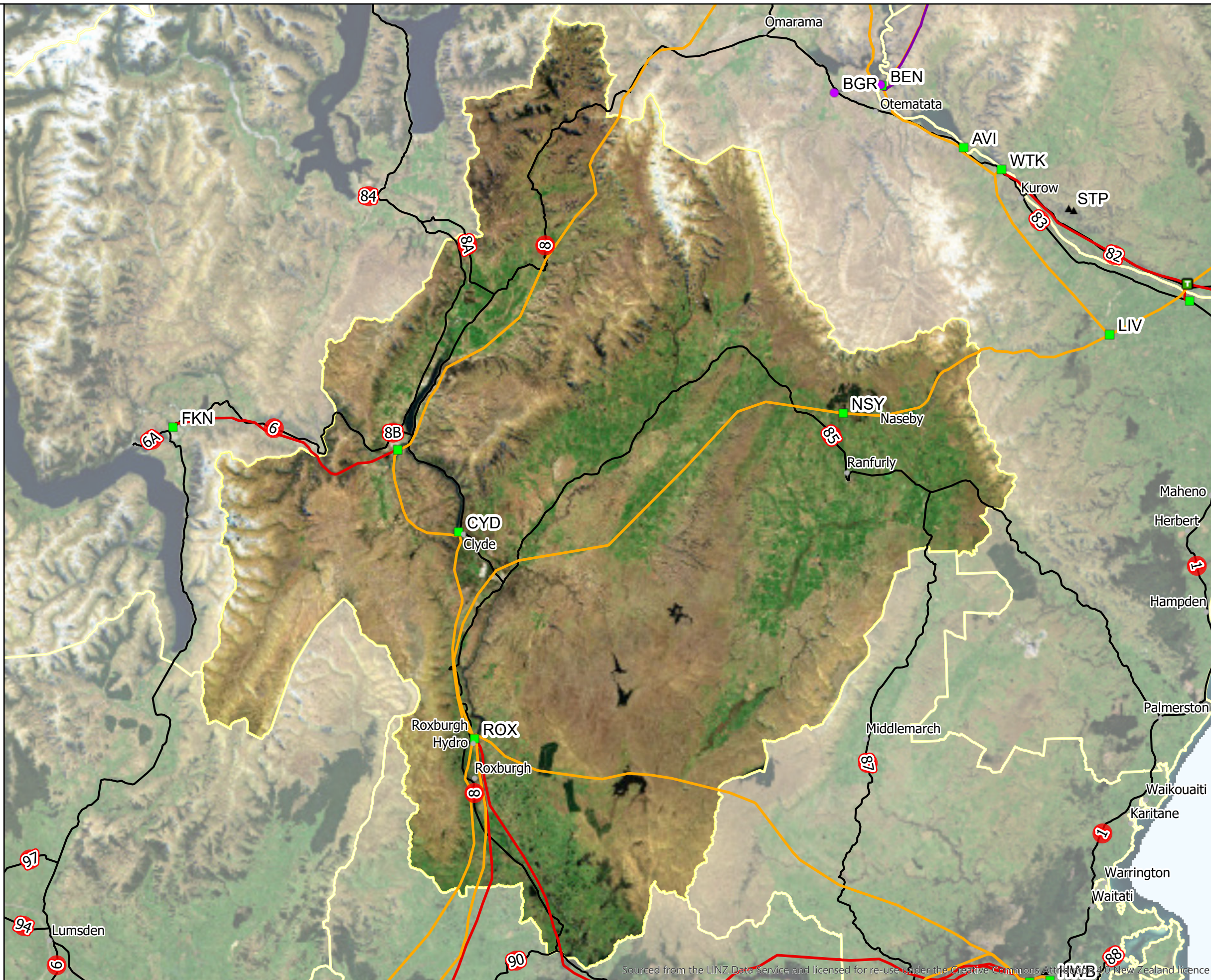
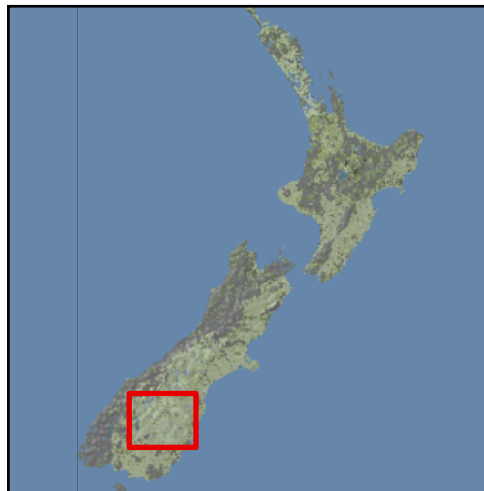
220kV Underground

220 kV Overhead

350 kV Overhead

350kV Submarine

400kV Overhead



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**TRANSPOWER**

Prepared by: Transpower Geospatial

Projection: NZTM 2000 Scale: 1:600,000 Plan Size: A3L

0 1,000 2,000 km

### External Disclaimer

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Date: 8/04/2020 Drawn by: berrymanem